



Central Office
1550 Main Street, 2nd Floor
P.O. Box 1410
Springfield, MA
01103-1410

SPRINGFIELD PUBLIC SCHOOLS - SPRINGFIELD, MASSACHUSETTS

Daniel J. Warwick
Superintendent of Schools
warwickd@sps.springfield.ma.us
Tel. 413.787.7087
Fax 413.787.7171

September 16, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Modernizing the E-Rate Program for Schools and Libraries, WC Docket 13-184

Dear Ms. Dortch:

The Springfield Public Schools is the second largest school district in Massachusetts, serving 25,000 students. Springfield also has the second highest percentage of students qualifying for free or reduced price lunch at 87.5 percent.

Our goal is for all our students, regardless of their background, to graduate from high school college and career ready. Technology is one of the major strategies we have for reaching that goal. We use numerous digital tools to provide differentiated interventions for struggling students, to provide credit recovery opportunities for high school students who have fallen behind, to daily enhance teaching and learning in the classroom, and to extend the learning day through blended and flipped classroom opportunities.

Given our demographics, we have benefitted significantly from the E-Rate program (52 of our 54 schools qualify for the 90 percent discount rate) and have strategically used the resources to ensure that we have a fiber WAN connection to every school and a wireless network within every school. We received \$4.7 million in E-rate discounts in the 2012-2013 school year (roughly \$188 per student).

However, even with E-Rate resources we are struggling to keep pace with demand. Our internet bandwidth is 16 Mbps per 1,000 students and our WAN bandwidth is 40 Mbps per 1,000 students (much less than the 100 Mbps internet and 1 Gbps WAN per 1,000 students discussed in the Proposed Rulemaking). Expanding our internet bandwidth is not as simple as contracting for greater service, it requires updating all hardware in our data center and potentially creating multiple data centers.

Our long-range plan is to have a computing device in the hands of every student, all day, every day by the start of the 2016-2017 school year. This will involve building out a dense wireless network in every school and dramatically increasing the amount of internet and WAN bandwidth we are purchasing. This likely will not be possible without significant support from the E-Rate program.

The purpose of this letter is to offer the following comments regarding efforts by the FCC to modernize the critically important E-rate program. We believe:

- E-rate should be primarily focused on providing, expanding, and maintaining broadband infrastructure, including wireless, in schools.
- Supporting and maintaining existing networks is a higher priority than building new networks.
- To reach our goal of one-to-one technology and to effectively implement next generation assessments (PARCC in our case), we will need as much as 100 Mbps internet bandwidth per 1,000 students and WAN bandwidth of 1 Gbps per 1,000 students. This will require not only purchasing additional bandwidth, but replacing all the equipment in our data center that manages this traffic.
- A dense wireless network (that can serve every student and staff member simultaneously), will be necessary in every school by 2015-2016.
- Apart from a significant increase in external funding, internet bandwidth of 1 Gbps per 1,000 students by 2017-2018 is not realistic.
- Providing disproportionately more funding to districts serving low income students is appropriate given that low income students are concentrated in Districts with the least capacity to raise additional funds locally. Any funding distribution plan that does not account for differences in served population will likely result in our District not meeting the goals described above.
- Of the funding distribution structures described, allocating funding to Districts upfront – assuming greater funding is provided per student for those students from disadvantaged backgrounds – would be highly beneficial in allowing our District to plan for the use of other resources with certainty around the amount of support.
- Reducing or eliminating funding for paging, directory assistance, calling features, text messaging, and web hosting would be beneficial in freeing more resources for basic broadband infrastructure.
- Reducing or eliminating funding for cellular data services being used to support one-to-one student devices would be appropriate given that this is a very costly way to provide one-to-one.
- Funding should continue for non-instructional technology centers that provide bandwidth to schools.
- Our district would have very limited capacity to maintain and support existing networks if funding for basic maintenance of internal connections were eliminated.
- While eliminating funding for basic phone service would free up funding for broadband, emphasizing or prioritizing a move toward Voice over Internet Protocol (VoIP) has the potential to further tax already burdened broadband networks in our schools.

It is past due time to modernize the E-rate program, and we would encourage you to move with all due haste in your deliberations. Should you have any further questions about the Springfield Public Schools, please do not hesitate to contact me at 413.787.7087.

Regards,



Daniel J. Warwick
Superintendent of Schools